

BEFORE THE INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

PUBLIC HEARING REGARDING
ARCELORMITTAL INDIANA HARBOR
2011 DRAFT WASTEWATER PERMITS

NPDES PERMIT IN0000094

NPDES PERMIT IN0000205

NPDES PERMIT IN0063355

NPDES PERMIT IN0063711

2011 SEP 23 A 11:25

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OFFICE OF
WATER QUALITY

COPY

PROCEEDINGS

in the above-captioned matter, before Hearing
Officer Paul Higginbotham, taken before me,
Lindy L. Meyer, Jr., a Notary Public in and for
the State of Indiana, County of Shelby, at Ivy
Tech Community College, Gary Campus, Multipurpose
Room, 1440 East 35th Avenue, Gary, Indiana, on
Thursday, September 15, 2011 at 6:00 o'clock p.m.

William F. Daniels, RPR/CP CM d/b/a
ACCURATE REPORTING OF INDIANA
12922 Brighton Avenue
Carmel, Indiana 46032
(317) 848-0088

1 APPEARANCES:

2 ON BEHALF OF IDEM:

3 Paul Higginbotham, Hearing Officer

4 Bruno Pigott

5 Richard Hamblin

6 Nicole Gardner

7 Stan Rigney

8 Amber Kent Finkelstein

9 Catherine Hess

10 SPEAKERS PRESENT:

11 Kevin Doyle

12 Patrick Gorman

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6:00 o'clock p.m.
September 15, 2011

THE HEARING OFFICER: Folks, it's 6:00 o'clock, so if you can find a seat, we can start here. Thank you. First I'd like to thank everybody for coming out this evening to this public hearing on the ArcelorMittal permit renewals as well as the issuance of two permits to ArcelorMittal Steel.

Before I start, I'd first like to swear in the court reporter tonight, so Lindy, if you could please stand and raise your right hand.

(Reporter sworn.)

(Discussion off the record.)

THE HEARING OFFICER: Sorry about that, folks. I'll try to speak up, and I know Bruno can be plenty loud, so -- he yells at me plenty at the office, so he'll be fine as well.

To get started next, I would also like to do introductions with folks that came up with me from Indianapolis IDEM office. First, Bruno Pigott's the Assistance Commissioner, Office of Water Quality. He came up with us tonight and

1 he'll be doing to PowerPoint presentation for us
2 on these permits.

3 In addition to that, Stan Rigney is the
4 Industrial Permits Section Chief.

5 Sitting next to Stan is Nikki Gardener,
6 she's one of the permit writers for the permits.

7 Then Richard Hamblin is also a permit
8 writer.

9 Out front is Catherine Hess, who's the
10 Section Chief of our Permit Administration
11 Section; she came up to help out this evening as
12 well.

13 And we also have Amber Finkelstein; she's
14 with our Media Office, here to help answer any
15 questions if there's any media folks here this
16 evening. Feel free to get with Amber after this
17 and we can address any questions you may have.

18 In addition, my name's Paul Higginbotham.
19 I'm the Branch Chief of the Wastewater Permits
20 Branch of the Office of Water Quality.

21 As you guys came in, we have the sign-in
22 sheet out front, and what we'll do is utilize
23 that sign-in sheet to make sure that we get final

1 permit actions out to anyone that's on that
2 sign-in sheet, so if you left your address or
3 your e-mail on there, we can contact you with the
4 final permitting actions that we do with these
5 permits.

6 In addition, we have speaker cards that
7 were out there, so if anybody would like to get
8 up and actually give an oral comment this
9 evening, they can do that, and I'll use those
10 cards to call people up after we go through our
11 PowerPoint presentation.

12 And we'll be taking written comments as
13 well, so if anybody brought written comments this
14 evening, we'll be taking those tonight, if you
15 want to give them to any of the IDEM staff.
16 They'll become part of the record of this
17 hearing.

18 The purpose of this hearing is to -- is
19 for the renewal of the ArcelorMittal East permit,
20 renewal of the ArcelorMittal West permit, as well
21 as the issuance of two new permits, the
22 ArcelorMittal Long Carbon and the ArcelorMittal
23 Central Waste Treatment permits.

1 And Bruno, as I said, will be going
2 through this PowerPoint presentation and will
3 give more details about what the permits are, why
4 we're doing four permits and not just two
5 renewals, and some of the additional issues that
6 are being addressed with these updated permits.

7 The permits themselves were public --
8 these draft permits were public noticed on
9 August 15th, and with a 45-day comment period.
10 That comment period ends -- we'll be taking
11 comments up through September 30th, at which time
12 we'll be preparing the final permitting actions
13 on all four permits.

14 Tonight's setup is just that, it's a
15 hearing. We're here to listen, to give the
16 people, the public, the opportunity to give any
17 comments they have or to ask any questions that
18 will be placed into the record. We want to hear
19 from you with the concerns or questions.

20 We will not be responding to comments and
21 questions tonight, but we will be responding in
22 writing to any of all of these comments or
23 questions we receive as part of the final

1 permitting actions that we take on these four
2 permits.

3 So, with that being said, I'll turn it
4 over to Bruno to go through the presentation,
5 then I'll come back up and do the actual calling
6 people up that want to comment on the permit.

7 MR. PIGOTT: Thanks, Paul.

8 My name's Bruno Pigott. I work in the
9 Office of Water Quality at the Department of
10 Environmental Management.

11 Paul ran through some of the purposes of
12 the meeting -- hearing tonight. What I want to
13 do, because we're talking about four separate
14 wastewater permits, is talk a little bit first
15 about the background on these type of permits, in
16 general terms, so that people in the room who may
17 not be familiar with this permit -- and we call
18 it the NPDES permit or wastewater permit -- to
19 get a better understanding of the background on
20 them.

21 A brief presentation on the permit process
22 itself. I want to explain why we're issuing four
23 permits tonight -- not tonight. We're having a

1 hearing on it tonight, but we anticipate issuing
2 four permits. I want to talk about the issues
3 associated with these four permits.

4 One of the goals tonight was to also make
5 sure that you folks walked out of here with
6 Citizen Summaries of all four of these permits so
7 that you can take something home that isn't a big
8 legal document, that is the permit, but helps to
9 summarize it in more plain English language,
10 because one of the things we happen to do very
11 poorly is talk in English --

12 (Laughter.)

13 MR. PIGOTT: -- at our Department.
14 We talk in Bureaucratese, and we think we know
15 what we're talking about, but oftentimes I get
16 people looking at me like "What are you talking
17 about?" I think this Citizen Summary should help
18 translate our language into English and help you
19 understand a little better what we're doing and
20 why we're doing it.

21 And we also have information about how to
22 get copies of the permit, because you may, after
23 looking at this Citizen Summary, also want to

1 take a look at the permit to get a more in-depth
2 look at each of these permits. And as Paul said,
3 we're going to take comments from folks who are
4 interested in providing comments.

5 Paul, when was this thing public noticed,
6 these four permits?

7 THE HEARING OFFICER: August 15th.

8 MR. PIGOTT: August 15th.

9 So, some of you may have already gone to
10 it, read the four permits, and have comments
11 tonight, and if so, great; we're here to listen
12 to them. And then we'll talk about next steps
13 for the permits to wrap up the meeting.

14 So, if it's okay with you guys, I'm going
15 to start with a picture of the facility. This
16 is -- I've got a lot of reasons for putting this
17 up, because, first of all, there are four
18 permits, and the question you may ask is, "Well,
19 what -- where do these four permits cover?" And
20 the answer to that is the four permits, we call
21 them different things.

22 One is called ArcelorMittal Central Waste,
23 and that's right here. Second is called

1 ArcelorMittal West; that deals with this area. A
2 third is ArcelorMittal East; that's this area.
3 And then the fourth is ArcelorMittal Long Carbon.
4 Four permits, two facilities, ArcelorMittal West,
5 ArcelorMittal East.

6 That's something that you ought to know
7 just to start. We've got two en -- two
8 facilities here, and we're issuing four permits.
9 In the past, we issued one permit for each
10 facility, but we're proposing to issue four
11 instead of two with these permits, and I'll go
12 into why.

13 But first I want to talk a little bit
14 about the NPDES permits, what we call NPDES
15 permits. It's wastewater permits. Any entity,
16 business, municipality, person that wants to
17 discharge to any kind of pipe, water to waters of
18 the state that contains pollutants must obtain
19 what we call a National Pollutant Discharge
20 Elimination System permit; and we, the Department
21 of Environmental Management, are charged through
22 U.S. EPA with issuing those permits.

23 So, the reason we're issuing permits here

1 is because these two facilities have, and have
2 been permitted for, discharges from those
3 facilities to waters, and we're renewing permits
4 for those two facilities and breaking them up a
5 little bit into four, but that's required under
6 the law. If you're going to discharge any
7 pollutants to a water of the United States, you
8 must obtain an NPDES permit, and that's what
9 these permits are.

10 What's in an NPDES permit? As I
11 mentioned, we have four NPDES permits. This is
12 just one of them. This is ArcelorMittal Indiana
13 Harbor East. It's got a permit number on it.
14 The permit numbers are really important. It
15 helps you distinguish between one permit and
16 another. This one is IN, and then five 0's,
17 and 94. Each of the different permits have
18 different permits numbers.

19 When you look at a permit, you may ask,
20 "Well, what do I want to look for? What do I
21 want to look in?" A permit is easy to look
22 through once you know what to look for. They're
23 still pretty daunting documents, but it helps to

1 know that the first thing you're going to see
2 with most permits is the cover page.

3 This is the cover page, page two of this
4 permit, because it's a big enough permit that we
5 included an index. It should help people get
6 through the permit. But the first page is really
7 the cover page.

8 And then there's what we call Part 1 of
9 the permit, and Part 1 is just after the cover
10 page, and Part 1 contains a whole bunch of
11 information, but some of the stuff that is in the
12 Part 1 of a permit is really critical, and that
13 is: What pollutants are being proposed to
14 discharge from this facility at different pipes?
15 And what are the regulations on the discharge or
16 pollutants from those pipes?

17 So, each of the permits has a limitation
18 on the pollutants that can be discharged from
19 every outfall, and they're listed in little
20 charts here. They tell you what pollutant it is,
21 how often they have to sample, what levels they
22 have to meet, a whole host of information. It's
23 really critical if you want to know what's coming

1 out of each outfall.

2 Those limits that are placed on it, the
3 controls on how much is allowed to be discharged
4 of what particular pollutant, are either
5 technology based limits or water quality based
6 effluent limits, whichever are more stringent.

7 And what we call technology based limits
8 are often limits that are derived using
9 guidelines that the Federal Government sets up
10 through U.S. EPA that says, "Well, for kind of
11 industry they're likely to have these kind of
12 pollutants, and therefore, if they do, these are
13 the kind of limits that -- these are the
14 guidelines for establishing limits for them.

15 And many of these permits have what we
16 call internal outfalls. Those are outfalls that
17 discharge from one part of the facility but don't
18 discharge to waters of the state yet, but go to a
19 pipe that leads out to like, say, the Indiana
20 Harbor Ship Canal or some other thing. So, we
21 have internal outfalls and external outfalls, and
22 there are -- sometimes we'll put limits on the
23 internal outfalls and external outfalls of these

1 things.

2 But when you look at a permit, it's Part 1
3 of the permit that helps you see what the limits
4 are, the monitoring frequencies, the different
5 kind of monitoring and reporting frequencies and
6 requirements, as well as any special conditions.

7 In these type of facilities, steel mills,
8 you'll see conditions governing the discharge of
9 water at a certain temperature. In our language,
10 we call that 316(a). It just refers to the
11 section the Clean Water Act. But that governs --
12 our 316(a) requirements govern the temperature
13 at -- that can be discharged from any facility.

14 And the special conditions in the permit
15 often revolve around temperature and the water
16 intake structures as well, and those would be in
17 the special conditions areas. Some of the intake
18 stuff require studies. Any study that a
19 facility's required to conduct is in the permit,
20 and it's often in the special conditions area.
21 So, you'll have Part 1 of the permit, which
22 contains all of these things.

23 And then you can go to Part 2 of the

1 permit, which contains what we call standard
2 conditions. It's the duty to reports, it's
3 the -- what some people might say the legal stuff
4 that has to be put into a permit to ensure that
5 the agency can take actions in the event of
6 certain occurrences at the facility. Important
7 stuff, but it's a part of every permit. They're
8 standard conditions because they're included in
9 just about every wastewater permit that we issue.

10 So, that's the way it's laid out, so if or
11 when you look at a permit, I'd advise you to look
12 at the cover page, but go to Part 1 of the permit
13 to get an idea of what kind of pollutants that
14 they're being regulated for out of what -- we
15 call them outfalls, but pipes that discharge to
16 waters of the state. Monitoring requirements are
17 in that Part 1, and special conditions, and then
18 Part 2 you'll find the standard language we
19 include in a lot of permits. That's the permit.
20 That's what it looks like.

21 One of the key things that's also
22 accompanying a permit but isn't the permit itself
23 is what we call the fact sheet. A fact sheet's

1 are really good document. If I were to advise
2 anyone about how to look at permits, I'd say, "If
3 you don't know anything about the way we do
4 business, look at that Citizen Summary first."
5 It will help you understand what we're doing in
6 English language terms.

7 Secondly, get a look at that fact sheet,
8 because the fact sheet helps explain why we did
9 what we did in our NPDES permits, and it's a
10 really useful document. It gives some of the
11 reasoning behind the limitations we put in
12 permits, and it gives you a description of the
13 activities that are covered, the types of
14 discharges, and any summary of the basis of
15 different requirements. That's the fact sheet,
16 and I think it's a really important thing to take
17 a look at in the permits.

18 So, now I'd like to talk a little bit
19 about these permits -- actually the facilities.
20 ArcelorMittal East and West, from our permitting
21 history, the two facilities had two separate
22 permits, as I mentioned before. ArcelorMittal
23 West, which was, if you'll look at the map, this

1 area here, that permit -- that's what the old
2 ArcelorMittal -- that's the ArcelorMittal West
3 facility, in general terms; this is ArcelorMittal
4 East.

5 The ArcelorMittal west permit was issued
6 in 1986. It was the last time this agency issued
7 that permit, a long time ago. They're supposed
8 to be renewed every five years. Shame on us. We
9 didn't. We're getting there now. We hope to
10 issue and renew the permit. It was LTD Steel at
11 that time.

12 But that permit, the west facility, was
13 issued in 1986. The East facility, on the east
14 side of that picture, was issued in 1996 as
15 Inland Steel, and then we did various
16 modifications to the permit over the years, 1990
17 and '91 for West, and 2001 for East.

18 And we finally got around to getting out
19 to reissue these permits. We've been working on
20 other permits all of the time as well. We've
21 been reissuing the U.S. Steel permit, the U.S.
22 Midwest permit, ArcelorMittal Burns Harbor.
23 There's a large number of permits that we've been

1 working to reissue.

2 Both of these permits now, those
3 facilities, were public noticed on August --
4 August 15th of 2011. But we're issuing four
5 permits. So, we're breaking them down from -- in
6 this way: ArcelorMittal East, the picture on the
7 map, you saw the east side of the picture, that
8 is now two permits.

9 The first permit is ArcelorMittal Indiana
10 Harbor Long Carbon, and there's the permit
11 number, so anybody who sees that will know. It's
12 also labeled quite clearly on the permit. And
13 then there's ArcelorMittal East facility, and
14 ArcelorMittal West is now broken down to
15 ArcelorMittal West and ArcelorMittal Indiana
16 Harbor Central Wastewater Treatment Plant.

17 The question is: Why are we issuing four
18 permits instead of two for these two facilities?
19 One reason is that these permits better reflect
20 the business operations of these steel mills, and
21 we could foresee a time when steel mills have to
22 sell off operations or move facilities around,
23 and to issue four permits allows us for an easier

1 transference process. Administratively, it's a
2 lot easier on us to break them into four pieces.

3 And despite the fact we've broken them
4 down into four permits, these two facilities have
5 no new discharges, so it's not that they're
6 renewing new pollutants coming out. It's just
7 that we're breaking them down for administrative
8 reasons into four permits to allow for
9 transference of portions of a facility if they're
10 sold off. It just makes it easier from an
11 administrative standpoint.

12 But the question might then be asked,
13 "Well, why are we doing a public notice of all of
14 these permits at the same time?" Well, the
15 answer is on the slide, but it's really all right
16 here. I mean this is the answer. Look at this.
17 This is really what we're permitting.

18 To understand this permit, which is
19 ArcelorMittal Long Carbon, and its impact on the
20 environment, to understand ArcelorMittal East and
21 its impact on the environment, ArcelorMittal West
22 or ArcelorMittal Central and its impact on the
23 environment, you can look at it alone, but you

1 really don't understand the impact until you
2 consider it holistically, because these two
3 facilities and these four permits have discharge
4 points all along here on the Indiana Harbor Canal
5 and the turnaround here.

6 And so, to consider them separately is to
7 miss a part of the picture. To public notice
8 them together is to allow the public to look at
9 this whole picture holistically, and literally,
10 looking at the picture, it seems to make sense to
11 me.

12 And I think that's what we tried to
13 explain here. They all discharge to the same
14 water bodies -- the ship canal, the harbor, Lake
15 Michigan -- and they provide that opportunity to
16 look at this stuff holistically. It's a lot of
17 paper, but it's all the same impact on the
18 environment, so we want you guys to take a look
19 at it and you understand, "Aha, this is the whole
20 picture."

21 Okay. So, what I want to talk about now
22 is the discharges to waters by permit. So, each
23 of these permits have discharges. Where are they

1 discharging to? ArcelorMittal Indiana Harbor
2 Long Carbon discharges to the harbor ship canal.
3 I showed you that on the map. It was the blue
4 line.

5 ArcelorMittal East discharges to the ship
6 canal, to the turning basin -- that's the wider
7 portion -- and to the Grand Cal. ArcelorMittal
8 West and the Central Wastewater Treatment Plant,
9 that's the west side, it's the ArcelorMittal West
10 facility, discharge -- west discharges to the
11 ship canal, to Indiana Harbor, and to Lake
12 Michigan in one part, and Indiana Harbor Central
13 Wastewater Treatment Plant discharges to the ship
14 canal. So, they all have an impact in the same
15 area, they all discharge to the same area.

16 So, the challenge for us in talking about
17 these permits is: How do you talk about four
18 permits at one time? And what we decided was the
19 most effective way to talk about these four
20 permits and take a look at the common issues.
21 What are the common issues with these four
22 permits? Because they are two facilities, so
23 they have a lot of commonalities, and they're

1 both steel mills.

2 So, what I want to do right now is talk
3 about specific pollutants that are in these
4 permits, something we call the 301(g) Variance.
5 Storm water requirements that are contained in
6 the permits, temperature requirements that are in
7 the permit, that means what temperature should
8 be -- what's the temperature that the discharges
9 should occur at, and water intake structure
10 requirements. The facilities take in water as
11 well as discharge it, and there are requirements
12 on what -- how they take in that water.

13 And then something that we talk about a
14 lot and often don't do a lot of about, but -- in
15 terms of rulemaking -- but it's our
16 antidegradation requirements and what we're doing
17 regarding antidegradation. The first thing I
18 want to talk about is specific pollutants. When
19 we put this out for public notice, we received
20 some comment from some folks about hexavalent
21 chrome, so I want to talk a little bit about
22 hexavalent chrome.

23 Now, hexavalent chrome is known to be

1 present at process operations of the discharge of
2 the Central Wastewater Treatment Plant and
3 ArcelorMittal East Outfall 14. There's a small
4 amount of excess chromate solution which is used
5 and collected and disposed of off-site when a
6 sufficient amount is available to move off-site.
7 So, it isn't actually discharged from these
8 facilities.

9 Hexavalent chrome is not discharged from
10 the pipes in the facilities. These permits
11 contain actually a prohibition on the discharge
12 of hexavalent chrome at these facilities, and
13 it's -- but what you might not find in the permit
14 is a limitation on the discharge, because it's
15 prohibited from being discharged, because the
16 facilities actually don't discharge it; they haul
17 off any water that contains hexavalent chrome.

18 You talk about lead and zinc. There are
19 different requirements with each of these
20 different permits for lead and zinc, depending on
21 the outfall. When we issue permits, we take a
22 look at each and every point that discharges
23 waters to the state.

1 We evaluate what pollutants are being
2 discharged and we determine whether or not
3 there's some reasonable potential to have
4 pollutants go into the water that would be
5 harmful to the environment.

6 Some of our limitations that we place on
7 those pollutants are developed using technology
8 limits, and they are imposed further up in the
9 pipe, in what we call internal outfalls, and some
10 are imposed at the end of the outfall, where it
11 discharges into the water.

12 Where water quality based limits -- there
13 are two kinds, technology based limits and water
14 quality based limits. We take a look at them
15 both. Whichever the more stringent limit is in
16 place we'll put into permits. So, where water
17 quality based limits are more stringent than
18 technology based limits, water quality based
19 limits are placed at a final outfall.

20 Mercury. Mercury's been a big issue for
21 years in facilities all around the State of
22 Indiana. Mercury limits have been established at
23 these facilities in all four permits. In the

1 Indiana Harbor Long Carbon, there's -- there are
2 mercury limits on Outfall 001, Indiana Harbor
3 East at three different outfalls, Indiana Harbor
4 West at four different outfalls, and at the
5 Central Wastewater Treatment Plant, their main
6 outfall, there are mercury limits. The first
7 time mercury limits have been imposed at this
8 facility, so this facility has tough mercury
9 limits in the draft permit.

10 Ammonia and phenols. ArcelorMittal East
11 has regulated -- has ammonia regulated through a
12 30 -- what we call a 301(g) Variance at Internal
13 Outfall 613, and an ammonia variance has been
14 continued at a previously approved level, but for
15 ArcelorMittal East we did not continue a phenols
16 variance.

17 ArcelorMittal West, ammonia and phenols
18 are regulated through a 301(g) Variance at three
19 different outfalls at previously approved levels.
20 And you may wonder, you say, "Well, what the heck
21 is a 301(g) Variance?" Well, here's the
22 definition of a 301(g) variance. It refers,
23 again, to Section 301(g) of the Clean Water Act,

1 and it allows for a variance.

2 A variance is a different limit on the
3 amount of pollutants that can be discharged, less
4 stringent, for sure, than the limit that would
5 otherwise be put in place from the applicable
6 best available technology requirements through
7 development of alternative limits, what we call
8 PMEL's, but you can just call them alternative
9 limits.

10 And 301(g) variances can granted for a
11 variety of things, but for these permits, the
12 main things that we focused on, that are focused
13 on, are ammonia and phenols. But you have to
14 meet certain strict federally imposed conditions.
15 So, for these four permits, the 301(g) variances
16 affect ArcelorMittal East, ArcelorMittal West,
17 and they're relevant for ammonia and phenols.

18 Well, I just mentioned that to qualify for
19 these different -- these alternative limits on
20 effluent discharges, you have to meet certain
21 strict criteria, and if a facility meets certain
22 strict criteria, they are automatically granted
23 these alternative limits.

1 It doesn't mean they can discharge phenols
2 or ammonia all day long at unlimited levels; it
3 means that alternative limits are place, and
4 those alternative limits must be put in place in
5 an amount that will not result in pollutant
6 discharges that would bioaccumulate, they
7 wouldn't persist in the environment, they
8 couldn't cause acute or chronic toxicity, and
9 they cannot interfere with the maintenance of
10 water quality.

11 So, the limits are put in place through
12 this process of creating alternative limits that
13 are protective of our water quality. And you
14 must meet all of the conditions that are up here
15 in this screen in order to qualify for this.

16 Now, in the past, ArcelorMittal West had a
17 variance for ammonia and phenols over three
18 different outfalls. They submitted an
19 application to renew this variance, and certain
20 things had changed over time, and because of the
21 changes, we had to reallocate the limitations on
22 three of the outfalls.

23 So, we continue to have limitations on

1 ammonia and phenols, and those will result in
2 compliance with water quality standards, and they
3 are arranged a little bit differently than they
4 were in the permit, but they still apply across
5 outfalls.

6 For ArcelorMittal East, we reviewed
7 effluent data for Internal Outfall 613, we looked
8 at the reporting requirements and looked at the
9 results from the reports that had been submitted
10 to us, and we found out that there's a treatment
11 system in place at that facility currently that
12 does remove phenols, so that we recommended that
13 we continued the different alternative limits for
14 ammonia, but did not renew the phenol variance or
15 alternative limits for ArcelorMittal East.

16 One of the big things in a facility like
17 this oftentimes is concerns about storm water.
18 Storm water hits the ground, it runs off, and it
19 carries with it pollutants to waters. We have
20 taken a look at our storm water requirements not
21 only in other permits across the state, but also
22 here in this one, and have included new storm
23 water requirements, new storm water requirements

1 that look at the specific facility and the
2 specific work they're doing at the facility and
3 tailored the requirements to the facility and the
4 kinds of product that they leave out, the kinds
5 of work they're doing.

6 And we've included what we call nonnumeric
7 or best management practice storm water limits in
8 the permit, and we were developing these
9 requirements in, through the use of the EPA, what
10 we call multi-sector general permit, which is, in
11 some ways, the gold standard by EPA of storm
12 water requirements. So, we've included new storm
13 water requirements in this permit that will help
14 reduce storm water runoff.

15 Thermal requirements. I mentioned that
16 there were some special conditions in permits,
17 and that temperature and intake waters are two
18 areas where there are special conditions imposed.

19 Temperature is limited on discharges under
20 IDEM rules and under the Clean Water Act, and we
21 have taken a look at the discharges from this
22 facility and we've determined by looking at past
23 discharges that ArcelorMittal's facilities do not

1 have a potential to exceed the temperature
2 requirements to maintain water quality.

3 So, these permits do not contain specific
4 temperature limits, but they continue to require
5 monitoring so we can continue to monitoring --
6 monitor the temperature of the discharge so that
7 if it changes, we can impose the requirements in
8 the future. They apply to all four permits.

9 We require the monitoring to take place
10 both where they draw in the water and where they
11 discharge the water. We call it the intake and
12 the effluent. And there's new reporting
13 requirements in the permit for ArcelorMittal
14 Central Wastewater Treatment Plant and the West
15 permits.

16 So, temperature requirements, while it
17 deals with where we draw water into the facility
18 and where it pumps out, really a lot of it
19 focuses on what's discharged. The other end
20 where you draw water in, has a different set of
21 requirements. We call them 316(b) requirements.

22 The 316(b) is just another reference to
23 the Clean Water Act. It really is designed to

1 take a look at the -- what is drawn into a
2 facility when it draws water in. The whole idea
3 is to protect fish populations that may be sucked
4 in, chewed up and spit out from a facility, to
5 put it crudely.

6 And so, there's a part of the Clean Water
7 Act that requires an examination to make sure
8 that people do certain things to help reduce the
9 animal population being sucked into intake
10 structures. These requirements are contained in
11 all four of the permits that are being public
12 noticed.

13 We took a look at these intake structures
14 and we did an evaluation of the structures and
15 said, "Are these facilities using the best
16 technology available to help ensure that they
17 don't unavoidably suck in fish and chew them up
18 and spit them out?" We did take a look at those
19 facilities. We took a look at their intake
20 structures and we determined that they were.

21 And we based our decision regarding the
22 intake structures and whether they were doing the
23 best technology available based on document

1 review, information provided by ArcelorMittal, as
2 well as going out and taking a look.

3 So, some of the reasons that the intake
4 structures are okay are that there's a
5 substantial reduction in water intake demand by
6 the facility; there's a substantial reduction in
7 the number of pumps that are running throughout
8 the facility simultaneously, which helps reduce
9 the intake of water.

10 Now, just because we did that evaluation
11 doesn't mean that that's all that we're required
12 to do. We also require the facility to, as part
13 of its permit renewal, conduct a series of
14 studies about these facilities, to take a look at
15 exactly what fish are being what we call impinged
16 and entrained, and that's literally sucked in and
17 chewed up, during the term of their permit.

18 And there's a whole explanation for the
19 studies that must be conducted by the facility in
20 the fact sheet of the permit, again, a good
21 reason to take a look at the fact sheet for the
22 permit, to understand what we're doing and why
23 we're doing it.

1 Some people take a look at toxic -- what
2 we hear as toxic release inventory stuff, and
3 raise concerns to our agency. The toxic release
4 inventory is a whole inventory of pollutants at
5 facilities. Facilities are required to fill out
6 documentation and submit it, or estimated numbers
7 of pollutants.

8 And when you look at the TRI data out
9 there and then look at our permits, you might
10 mistakenly believe that, well, there's a huge
11 problem, specifically in this per -- in these
12 permits, with chromium or hexavalent chrome -- is
13 it hexavalent chrome or total chrome -- in the
14 permit, because toxic release inventory data
15 seems to conflict with our own analysis of what's
16 going on.

17 But you have to understand a little bit
18 about the toxic release inventory to understand
19 why the two things don't marry up very well.
20 This toxic release inventory is a collection of
21 data. It's really useful. It's meant -- the
22 whole origin of collecting this data was to help
23 people around facilities get some idea of

1 estimates of pollutants out there.

2 But it's not as precise as the data
3 collection that we use to determine what kinds of
4 limitations to put on permits. The data, for
5 example, that are collected through the toxic
6 release inventory are estimates. They're annual
7 summaries of expected emissions. They don't
8 provide any indication of projected effluent
9 quality, which is critical for our evaluation of
10 whether water quality standards will be met.

11 The data are summarized by parameters that
12 are defined differently than we define some
13 parameters in our analysis of water quality
14 standards, and they're gathered differently.
15 Literally the sampling is different, the -- some
16 of the TRI information are estimates, and it's
17 not a good tool to use to analyze the effect of a
18 facility on -- or potential effect of a
19 facility -- on water quality.

20 It's got its uses. It's really important
21 for citizens, but it's not the data we use to
22 evaluate a facility's impact on water quality
23 using actual data. So, I just want to make sure

1 people understand, there is a difference between
2 TRI information and information we use to
3 determine whether or not to put certain limits in
4 permits.

5 And our information is a little more
6 specific, the sampling that are required to
7 evaluate that stuff is required to be
8 representative sampling, it's required to be
9 collected more frequently, and it's more precise.

10 Antidegradation. I talked to my
11 colleagues here before, and I said, "Geez, how am
12 I going to explain this thing called
13 antidegradation?" And here's the only way I can
14 think of it: There are certain -- there are
15 water bodies all across the state where, for
16 certain pollutants, let's say, just to throw one
17 out, E. Coli.

18 The water in that water body is better
19 than the water quality that is required, the
20 minimum water quality levels that is required in
21 that water body. So, it's a little better, a
22 little higher quality for each and every -- for
23 certain pollutant parameters.

1 And what the antidegradation process is,
2 in simple terms, is really to not degrade unless
3 there's a good social or economic reason for
4 doing so.

5 So, the antidegradation process is a
6 process that forces a facility, when it has a new
7 discharge or an increased discharge of a
8 pollutant, to analyze whether or not there's a
9 social or economic reason for increasing their
10 discharge and degrading the quality of water down
11 to what we require for water quality standards.

12 The whole incentive is to keep the waters
13 cleaner than just meeting our water quality
14 standards. So, when we look at permits, are
15 going out to reissue permits, we look at them and
16 ask our first question, which is: Are these
17 facilities looking to have new discharges or
18 increased discharges of pollutants?

19 If there are no increases in discharges of
20 pollutants or no new pollutants that are being
21 discharged, then there's a -- no need for the
22 facility to conduct a demonstration that they
23 need to degrade the environment for those new

1 pollutants, and that's what antidegradation's
2 about.

3 In these four permits we conducted that
4 analysis. Are there new pollutants that are
5 being discharged? No. Are there increases in
6 the levels of the pollutants that are being
7 discharged? No.

8 And there are new limits on pollutants,
9 there are new limits, but there are not new
10 pollutants discharged, and the reason there are
11 new limits on pollutants but there aren't new
12 pollutants being discharged is because, in some
13 cases, these permits had pollutants that were
14 being discharged before that weren't regulated.

15 Now we're regulating. Now we are putting
16 limits on them. It's not that they have new
17 pollutants being added to the water. It's the
18 same thing -- they're going to decrease the level
19 of those pollutants.

20 Therefore, this -- none of these permits,
21 any of the four permits, allow for a new or
22 increased pollutant loading to waters of the
23 state, and that's the analysis we have to conduct

1 to determine whether or not a facility has to go
2 through a process of justifying a degradation.

3 And we found in all four of these permits
4 that that was not the case. There was no need
5 for an antidegradation demonstration. We did our
6 review on all four permits, and I just ran
7 through the bottom part of that slide.

8 Okay. Overall, there's lots of changes to
9 these permits from the old permits, and when you
10 have an old permit that was issued in 1986, it's
11 likely there are going to be more changes. So,
12 here's a list: New mercury limits; more
13 stringent limits for several pollutants including
14 oil and grease, total residual chlorine, zinc,
15 lead, copper, silver, naphthalene, TCE, cadmium,
16 total chromium, nickel, total cyanide at specific
17 outfalls in these different permits.

18 We thought about listing each outfall and
19 which one had them, but it could go on for pages
20 and pages. The main thing is to highlight for
21 you folks that there are new limits, there are
22 new more stringent limits, at outfalls throughout
23 these permits.

1 And there are new reporting requirements
2 as well, and there's new chronic and acute
3 biomonitoring at specific outfalls that --
4 biomonitoring's a fancy word, but it really means
5 collecting some pollution and testing it, giving
6 some very sensitive aquatic fish species, and
7 finding out whether or not that discharge to that
8 water is likely to -- with the combination of
9 pollutants -- is likely to be toxic, because you
10 don't want to have toxicity. So, we require
11 toxicity studies or a whole effluent toxicity
12 testing.

13 And then we are requiring new studies for
14 what I call the 316(b) stuff, impingement and
15 entrainment, and we have new, more stringent
16 storm water requirements that should be familiar
17 to folks who really look at these permits because
18 we imposed them on the U.S. Steel permit facility
19 at Gary Works, at Indiana Harbor -- I mean Burns
20 Harbor -- and U.S. Midwest. And there are new
21 reporting requirements for temperature, so
22 there's a whole host of changes that make these
23 permits all much more stringent than the past

1 permits.

2 Now, in terms of next steps, what are we
3 doing? Well, tonight is our public hearing. The
4 comment period -- we wanted to conduct the public
5 hearing so that you could have an understanding
6 of what we see in the permit. You can comment
7 tonight.

8 But you can also go home and take a look
9 at it some more yourself, after hearing us, and
10 decide to provide written comments. If you do,
11 you can send them to us up to September 30th,
12 2011. Make sure your comments are postmarked
13 September 30th or e-mailed September 30th.

14 Do we accept e-mailed comments?

15 THE HEARING OFFICER: Yes, we do.

16 MS. READ: 4:00, 4:00 o'clock?

17 MR. PIGOTT: Is it 4:00 o'clock? Is
18 it 12:00 midnight?

19 THE HEARING OFFICER: It's --

20 MR. PIGOTT: We're fine, as long as
21 it's September 30th, 2011.

22 MS. READ: What if it's mailed on
23 September 30th?

1 MR. PIGOTT: That's fine. If it's
2 mailed September 30th, 2011, we'll still accept
3 the comments if they come in October 2nd. You
4 know, it's just that the postmark must be
5 September 30th, and that's all we're asking.
6 We've had this permit out for a total of 45 days
7 at the end of September 30th, so we recognize
8 that it's not the average single permit, there's
9 a lot of paper to look through, and we want to
10 provide people time to comment.

11 And if you really want to look at the
12 permits, we thought we'd save some paper by not
13 printing off all four permits for everybody in
14 the room. There's a Web site you can go to, and
15 you can view it on your screen or you can print
16 it off.

17 Is it also available at the library?

18 THE HEARING OFFICER: Yes.

19 MR. PIGOTT: Which library?

20 THE HEARING OFFICER: I think it's --

21 MS. READ: Gary?

22 MR. PIGOTT: Should be Gary.

23 THE HEARING OFFICER: There's two

1 libraries, Gary and --

2 MS. FINKELSTEIN: Gary, and at the
3 Lake County Health Department.

4 THE HEARING OFFICER: And at the
5 Department, at our Northwest Office.

6 MS. READ: IDEM?

7 MS. FINKELSTEIN: And the Northwest
8 Office.

9 THE HEARING OFFICER: Yes.

10 UNIDENTIFIED SPEAKER: You can also
11 download it as a PDF on your computer.

12 MR. PIGOTT: There you go, you can
13 download it as a PDF on your computer as well.

14 So, once we get all of the comments in, we
15 will take a look at them, and we'll say, "Okay.
16 Are people providing us with information that is
17 directly applicable to the permit, you know, this
18 permit parameter should be less stringent or more
19 stringent, you forgot about this pollutant," and
20 we'll evaluate those comments. "You need more
21 monitoring or something in a certain place."

22 Please write us and let us know, tell us
23 tonight, and we'll take a look at those comments.

1 We'll respond to them as part of our package of
2 issuance of the permit, and we will make changes
3 where we think those comments are relevant and
4 where we think we need to make changes to ensure
5 that the permit is defensible.

6 Now, I do want to say that these permits
7 are big permits. They're important permits for
8 our environment, and because they're so
9 important, we're not the only ones involved in
10 these permits. We've been working with U.S. EPA
11 for quite some time on these permits, and we've
12 talked to them about all of the requirements that
13 exist in these permits.

14 They have written us a letter, after
15 reviewing the permits, saying that they believe
16 these permits are justifiable, and they basically
17 said, "These are the requirements you're going to
18 have in your permits." We believe that EPA is
19 satisfied with these permits, but they understand
20 that valuable public comments could be received
21 during the comment period.

22 And so, we -- both organizations, both
23 IDEM and EPA, will look at the public comments

1 after the public comment period and determine
2 whether or not sufficient changes must be made to
3 the permits to ensure that they meet Clean Water
4 Act requirements.

5 After we're done with all of that, we're
6 going to issue the permits. My boss is telling
7 me he wants these permits issued by the end of
8 the year, so I'm telling him he's got to get
9 these permits issued by the end of the year, he
10 goes and tells him that he's got to get the
11 permits issued by the end of the year, and those
12 guys are the guys that do the work.

13 So, that's what's going to happen. We
14 expect to act expeditiously once comments come
15 in, evaluate whether changes need to be made to
16 the permits, make them where they're necessary,
17 and then issue the permits.

18 I think under any circumstances, if you
19 look at this list, these permits are more
20 stringent than the past permits. I think they
21 are protective of water quality, and I'm pretty
22 proud of the work our people do to protect water
23 quality and issue decent permits.

1 I'm done, so it's his turn to run the
2 public hearing part, and you guys are probably
3 tired of hearing me anyway, so thanks for you
4 your time.

5 THE HEARING OFFICER: Thank you,
6 Bruno.

7 All right. The one thing I forgot to
8 mention at the beginning, as folks come up, we
9 have a -- and Lindy, I can turn that mic off,
10 too, but folks should just stand up here if they
11 want to give public comment at tonight's hearing.
12 I just ask that you give your name, you spell
13 your name, and if you're with a group or
14 organization, I just ask that you also say what
15 group or organization you're representing.

16 And I don't know if anybody else has
17 filled out a speaker card, and if you haven't but
18 you still want to after we go through the first
19 couple of folks that have filled out a card, if
20 you can just raise your hand and we can call --
21 or Amber has some blank cards back there, so if
22 you want to fill out a card so we'll have that
23 information, feel free to do so.

1 With that, I guess the first person I'll
2 call to give comment is Kevin Doyle.

3 MR. DOYLE: D o y l e. Okay. Can
4 you hear me? My name's Kevin Doyle, and I'm the
5 manager of environmental at the ArcelorMittal
6 steel-making facility in East Chicago, Indiana.

7 I'd like to first thank IDEM and the staff
8 that worked on the draft NPDES permit renewals
9 for their diligence and perseverance. It's a
10 tough and complex job dealing with all of the
11 regulatory and facility-specific issues, but
12 ultimately issuing these permits is the most
13 appropriate way to manage and address those many
14 issues. We truly appreciate your efforts.

15 The issuance of a valid, current NPDES
16 permits is very important to both ArcelorMittal
17 and the community. The NPDES permits help ensure
18 that progress continues in a way that not only
19 reduces environmental impact, but also ensures
20 viability of operations while meeting enhanced
21 standards.

22 For ArcelorMittal, valid and current
23 permits ensure continued economic viability and

1 operational certainty. For the community, valid
2 and current permits ensure a good quality of life
3 with the protection of our water resources as
4 well as the continued economic viability of these
5 facilities.

6 ArcelorMittal received this public notice
7 of the draft permits on August 17th, 2011, and we
8 are now in the process of evaluating the contents
9 of all four permits. This is a comprehensive and
10 time-consuming endeavor, and our review is still
11 underway. ArcelorMittal will submit detailed
12 comments on the draft permits to IDEM as part of
13 the public comment process.

14 ArcelorMittal recognizes that making steel
15 has an impact on the environment. As an industry
16 leader, it is our responsibility to set an
17 example for improving the sustainability of our
18 products both by reducing our environmental
19 impact and enhancing our product's environmental
20 performance. Through focused compliance,
21 continuous improvement and innovation, we can
22 advance environmental stewardship for the
23 enjoyment of future generations.

1 It is important to recognize that
2 significant improvements in water quality have
3 occurred in the Calumet -- Grand Calumet River,
4 the Indiana Harbor Ship Canal and Lake Michigan
5 in recent decades. Data compiled by IDEM for the
6 past ten years demonstrates this accomplishment.

7 ArcelorMittal will continue to do its part
8 in maintaining and enhancing these historical
9 water quality improvements. With all this in
10 mind, ArcelorMittal will evaluate IDEM's four
11 draft permits and develop recommendations and
12 suggestions to IDEM consistent with our core
13 values and in a manner that will aid or
14 operations in achieving superior environmental
15 performance.

16 Thank you very much for your attention and
17 your -- all of your efforts.

18 THE HEARING OFFICER: Thanks, Kevin.

19 MR. DOYLE: Thank you.

20 THE HEARING OFFICER: The next
21 speaker I have is Patrick Gorman.

22 MR. GORMAN: Good evening. My name
23 is Patrick Gorman, G o r m a n. I'm the

1 facilitator for the Indiana Steel Environmental
2 Group. The Indiana Steel Environmental Group is
3 a coalition of Indiana steel companies
4 established to focus on environmental matters of
5 concern to its members.

6 The Indiana Steel Environmental Group
7 consists of membership from ArcelorMittal USA,
8 ArcelorMittal Indiana Harbor, United States Steel
9 Gary Works, United States Steel Midwest Plant,
10 ArcelorMittal Burns Harbor, and Nucor Steel
11 Crawfordsville. Together, these companies
12 operate facilities in Indiana that produce over
13 18 million tons of steel annually and directly
14 employ over 10,000 people.

15 In addition, it is estimated that an
16 additional 100,000 people are employed by other
17 firms that provide services to these facilities.
18 As a result, these facilities provide significant
19 contribution to both state and national economy.

20 These companies operate facilities that
21 require NPDES discharge permits or industrial
22 pretreatment discharge permits. For years,
23 Indiana has not reissued NPDES discharge permits

1 for major industries when they've expired. As a
2 result, Indiana has had a large number of expired
3 NPDES permits that were administratively
4 extended.

5 Over the past seven years, the Indiana
6 Department of Environmental Management has worked
7 to reduce the number of administratively extended
8 permits in Indiana, and has eliminated the
9 backlog of expired permits. The Indiana Steel
10 Environmental Group strongly supports Indiana's
11 goal to reduce the backlog of these expired
12 permits that have been administratively extended.

13 The Indiana Steel Environmental Group
14 strongly believes the NPDES permitting process
15 should be carried out in full accordance with the
16 established provisions contained in the Clean
17 Water Act and Indiana's Administrative Code, not
18 more, not less.

19 The Clean Water Act provides an
20 established framework for issuing permits that
21 have been incorporated within Indiana's
22 Administrative Code through significant public
23 review, comment, and EPA's final approval that

1 this Code contains at least all of the required
2 elements mandated by the Clean Water Act.

3 It is totally inappropriate to have an
4 established and approved regulatory mechanism for
5 issuing permits and then to selectively abandon
6 that process based on public emotion or the
7 perception of a few.

8 The ground rules developed for the
9 permitting process were established many years
10 ago, based on sound science, were open for public
11 review and discussion, and received EPA's
12 approval before they could be implemented. These
13 rules must now continue to be followed.

14 In summary, the Indiana Steel
15 Environmental Group urges U.S. EPA to support the
16 process of states issuing timely NPDES permits
17 that are protective of human health and the
18 environment under the Clean Water Act, with
19 limits that are developed and supported by sound
20 science. When these permits are properly issued,
21 they are protective of human health and the
22 environment, and are in everyone's best interest.

23 Thank you for your consideration of these

1 comments.

2 THE HEARING OFFICER: Thank you,
3 Patrick.

4 That was the last speaker card that I
5 have. I don't know if anybody else would like to
6 speak this evening.

7 MS. READ: I've just got some
8 questions. I don't know if you can answer them
9 or not, but --

10 THE HEARING OFFICER: Charlotte, you
11 can provide the questions and get them into the
12 record, but we won't be responding tonight to --

13 MS. READ: Okay.

14 THE HEARING OFFICER: -- questions.

15 MS. READ: Okay.

16 THE HEARING OFFICER: But we will be,
17 as I mentioned, in writing responding to all
18 questions and comments raised.

19 So, does anyone else?

20 (No response.)

21 THE HEARING OFFICER: I'm also going
22 to try -- if I can't get that tomorrow, it'll
23 definitely be up Monday, a copy of the PowerPoint

1 will be at that same Web site that was given
2 tonight. A copy of this PowerPoint will be up on
3 the Web at the latest by Monday, so I'll work on
4 getting that done as well.

5 Again, I encourage folks to provide
6 written comments to these permits, as it's a key
7 part of the process that we do. We take them
8 seriously, and we do want to have, the permits
9 that are out there, that address all of the legal
10 requirements in the Clean Water Act as well as
11 any state regulations.

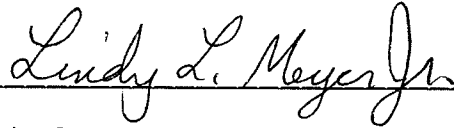
12 I thank everybody for coming out tonight
13 and wish everybody a safe trip home, and with
14 that, I draw this public hearing to a conclusion.

15 Thank you.

16 - - -
17 Thereupon, the proceedings of
18 September 15, 2011 were concluded
19 at 6:58 o'clock p.m.
20 - - -
21
22
23

1 CERTIFICATE

2 I, Lindy L. Meyer, Jr., the undersigned
3 Court Reporter and Notary Public residing in the
4 City of Shelbyville, Shelby County, Indiana, do
5 hereby certify that the foregoing is a true and
6 correct transcript of the proceedings taken by me
7 on Thursday, September 15, 2011 in this matter
8 and transcribed by me.

9
10 

11 Lindy L. Meyer, Jr.,

12 Notary Public in and
13 for the State of Indiana.

14
15 My Commission expires October 27, 2016.
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23

	4	advance [1] - 47:22 advise [2] - 15:11, 16:1 affect [1] - 26:16 agency [3] - 15:5, 17:6, 33:3 ago [2] - 17:7, 51:10 Aha [1] - 20:19 aid [1] - 48:13 allow [3] - 19:8, 20:8, 37:21 allowed [1] - 13:3 allows [2] - 18:23, 26:1 alone [1] - 19:23 alternative [9] - 26:7, 26:8, 26:19, 26:23, 27:3, 27:4, 27:12, 28:13, 28:15 Amber [4] - 2:5, 4:13, 4:16, 45:21 Ammonia [1] - 25:10 ammonia [9] - 25:11, 25:13, 25:17, 26:13, 26:17, 27:2, 27:17, 28:1, 28:14 amount [4] - 23:4, 23:6, 26:3, 27:5 analysis [4] - 33:15, 34:13, 37:4, 37:23 analyze [2] - 34:17, 36:8 animal [1] - 31:9 annual [1] - 34:6 annually [1] - 49:13 answer [5] - 4:14, 9:20, 19:15, 19:16, 52:8 anticipate [1] - 8:1 antidegradation [6] - 22:16, 22:17, 35:13, 36:1, 36:5, 38:5 Antidegradation [1] - 35:10 antidegradation's [1] - 37:1 anyway [1] - 45:3 APPEARANCES [1] - 2:1 applicable [2] - 26:5, 42:17 application [1] - 27:19 apply [2] - 28:4, 30:8 appreciate [1] - 46:14 appropriate [1] - 46:13 approval [2] - 50:23, 51:12 approved [3] - 25:14, 25:19, 51:4 aquatic [1] - 39:6 ARCELORMITTAL [1] - 1:5 ArcelorMittal [56] - 3:7, 3:9, 5:19, 5:20, 5:22, 9:22, 10:1, 10:2, 10:3, 10:4, 10:5, 11:12, 16:20, 16:22, 17:2, 17:3, 17:5, 17:22, 18:6, 18:9, 18:13, 18:14, 18:15, 19:19, 19:20, 19:21, 19:22, 21:1, 21:5, 21:7, 21:9, 23:3, 25:10, 25:15, 25:17, 26:16, 27:16, 28:6, 28:15, 30:13, 32:1, 46:5, 46:16, 46:22, 47:6, 47:11,	47:14, 48:7, 48:10, 49:7, 49:8, 49:10 ArcelorMittal's [1] - 29:23 area [6] - 10:1, 10:2, 14:20, 17:1, 21:15 areas [2] - 14:17, 29:18 arranged [1] - 28:3 Assistance [1] - 3:22 associated [1] - 8:3 attention [1] - 48:16 August [6] - 6:9, 9:7, 9:8, 18:3, 18:4, 47:7 automatically [1] - 26:22 available [5] - 23:6, 26:6, 31:16, 31:23, 41:17 Avenue [2] - 1:17, 1:22 average [1] - 41:8
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